

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION

2006 OCT 17 A 9:48

DAVID FINNEY, an individual,

Plaintiff,

v.

TAKATA, a foreign corporation;
TAKATA U.S.A. CORPORATION
d/b/a TAKATA CORPORATION,
a foreign corporation, Et al.

Defendants.

CV NO. 3:06-CV-622-WKW

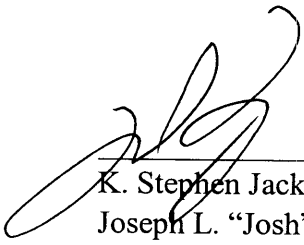
THOMAS P. HACKETT, CLERK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

**PLAINTIFF'S MOTION FOR LEAVE OF COURT TO PROPOUND
ADDITIONAL WRITTEN INTERROGATORIES TO DEFENDANTS**

COMES NOW Plaintiff David Finney, by and through his counsel of record in the above-styled case and respectfully requests this Honorable Court to allow him to serve additional interrogatories to the named party defendants in this lawsuit. As grounds for same, Plaintiff states as follows:

1. The instant case involves a complex products liability subject matter involving Defendant Nissan North America, Inc., a major automobile manufacturer, and at least six separate subsidiaries of Defendant Takata Corporation, a seat belt manufacturer and distributor. The Plaintiff is diligently attempting to identify any further entities which may be proper party defendants.

2. Consequently, the Plaintiff respectfully requests this Honorable Court to allow the Plaintiff to serve written interrogatory requests over and above the 25-interrogatory limit set forth in F.R.C.P. 33(a).



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Joseph L. "Josh" Tucker (TUC 033)
Joel L. DiLorenzo (DIL018)
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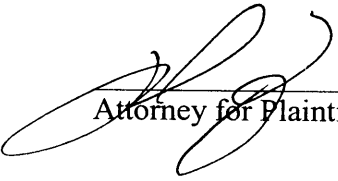
Walter B. Calton, Esq.
312 East Broad Street
Eufaula, AL 36027

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above was served upon the following via regular United States Mail, postage prepaid and properly addressed on this 16th day of October, 2006.

Charles A. Stewart, III, Esq.
Bradley, Arant, Rose & White, LLP
Attorney for Defendant Takata

Robert C. Khayat, Jr., Esq.
King & Spalding, LLP
Attorney for Defendant Nissan North America



Attorney for Plaintiff